

East Valley Taxpayers Coalition AMII: 18

209 S. San Mateo Street Redlands, CA 92373 FPPC #93-2000

OFFICE OF CENERAL COUNSEL

12, July 16, 2012

Office of General Counsel FEDERAL ELECTION COMMISSION 999 E Street, N.W. Washington, D.C. 20463 MUR# 6614

Re: Complaint for Willful Failure and Refusal to File the Required Campaign Financial Disclosure Forms Disclosing the True Source of Contributions & Expenses Against William Gregg Imus and his Imus for Congress (FEC ID#C00498311) Committee.

To Whom It May Concern:

The purpose of this letter is to file a formal complaint against **William Gregg Imus** and his Imus for Congress committee (FEC ID# C00498311), PO Box 308, Blue Jay, California, 92317-0308.

Imus is an experienced politician who is well aware of campaign disclosure laws. This is demonstrated by his past political experience including serving as campaign manager for California Assemblyman Tim Donnelly during his 2010 campaign for California State Assembly; having served as Donnelly's Chief of Staff for his State Assembly District; and having managed his own federal campaign for Congress beginning in or about July 2011.

Despite Imus' political experience, he failed to file the required Pre-Primary campaign disclosure report covering the period April 1, 2012 through May 16, 2012; and when he was notified of this failure continues to refuse to file the requisite report through and including to date.

On or about May 25, 2012 Imus was notified by the Federal Election Commission's Reports Analysis Division that he failed to file the required Pre-Primary report of receipts and expenditures. This notice allowed Imus four (4) additional business days within which to file the report to avoid publication. A copy of this notice is attached as "Attachment A".

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July 15, 2012 FEDERAL ELECTION COMMISSON 999 E Street, N.W. Washington, D.C. 20463 Page 2

Despite the notice, Imus his committee continued to refuse to disclose the true sources and amounts of their funds and expenditures. In fact, Imus has hidden the true source of his contributions and amounts of his expenditures since April 1, 2012.

Additionally, federal election law requires filing of 48-hour notices during the 20-day period immediately prior to the election. Imus his committee never filed any of these reports. It is not known whether any 48-hour notices were required because Imus and his committee continue to fail to file any campaign disclosure reports.

Imus' failure and subsequent refusal to file the required reports has deprived the public, the voters, and taxpayers of potentially valuable knowledge about his candidacy and character.

Therefore, we request the Federal Elections Commission investigate this matter and take whatever action(s) are necessary and proper to assure Mr. Imus and his committee comply with the laws of our country.

I declare, under penalty of perjury, that the information contained in this complaint is true and correct to the best of my knowledge and belief.

R.A. Roberts, Treasurer

ATTACHMENT A





FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

2012 JUL 24 AMII: 18

May 25, 2012

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OFFICE OF GEHERAL COUNSEL

CHAD HANELY, TREASURER IMUS FOR CONGRESS PO BCK 308 BLUE JAY, CA 92317-0308

IDENTIFICATION NUMBER: C00498311

REFERENCE: PRE-PRIMARY REPORT 4/1/2012 - 5/16/2012

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED.

YOU WILL BE ALLOWED URTIL 5:80 PM EST ON THE BODNIE (4th) EMBISSED DAY FROM 'CHE DATE OF THIS NOTICE THE FILE TIME REPORT TO AVOID BUBLICATION. IF YOU HAVE ALREADY FILED THE REPORT BY EXPRESS, CERTIFIED OR REGISTERED MAIL OR ARE PLANNING TO FILE IT WITHIN FOUR (4) BUSINESS DAYS FROM THE DATE OF THIS NOTICE, PLEASE NOTIFY US IMMEDIATELY OF THE CERTIFIED, REGISTERED OR BXPRESS TRACKING NUMBER AND THE DATE THAT THE REPORT WAS EENT.

THE BEDORT MUST BE FILED MITH THE FEDERAL BLECTION COMMISSION, 899 E STREET, N.W., WASHINGTON, D.C. 20463 FOR HOUSE CANDIDATES, OR THE SECRETARY OF THE SENATE, 232 HART SENATE OFFICE BUILDING, WASHINGTON, D.C. 20510 (MAILING ADDRESS: OFFICE OF PUBLIC RECORDS, P.O. BOX 77578, WASHINGTON, DC 20013-7578), FOR SENATE CANDIDATES. PLEASE NOTE THAT ELECTRONIC FILERS MUST SUBMIT THEIR REPORTS BLECTRONICALLY, AS PER 11 CFR \$104.18. A COPY OF THE REPORT MUST ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER UNLESS THE STATE IS EXEMPT FROM THE FEUERAL REQUIREMENT TO RECEIVE AND FRINTAIN PAPER COPIES.

DS ADDITION, THE RILLUME TO TIMELY FELS THIS REPORT MAY RESULT IN TIVIL, MONEY PENALTIES, AN AUDIT OR OTHER LEGAL EMPORCEMENT ACTION. THE CIVIL MONEY REPALTY CALCULATION FOR LATE PEPORTS DOES NOT INCLUDE A GRACE PERIOD AND BEGINS OF THE DAY FOLLOWING THE DUE DATE FOR THE REPORT.

IF YOU HAVE ANY QUESTIONS RECARDING THIS MATDER, PLEASE CONTACT CERTSTOPHER RITCHIE IN THE REPORTS ANALYSIS DIVISION ON OUR TOLL ERES NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

Debie Chaina

DEBBIE CHACONA ASSISTANT STAFF DIRECTOR REPORTS ANALYSIS DIVISION (RAD)

Jurat

State of California

County of San Bernardine

20 12 by Robert A Roberts proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

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ANGELINE GUARDADO-ABAD Commission # 1849783 Notary Public - California San Bernerdino County My Comm. Expires May 26, 2013

OPTIONAL INFORMATION

DESCRIPTION OF THE ATTACHED DOCUMENT East Valley Tax Payors Coal thon formed Complaint Letter (Title or description of attached document) (Title or description of attached document continued) Number of Pages 5 incl. Junet Document Date 7 1512 (Additional information)

INSTRUCTIONS FOR COMPLETING THIS FORM

The wording of all Jurats completed in California after January 1, 2008 must be in the form as set forth within this Jurat. There are no exceptions. If a Jurat to be completed does not follow this form, the notary must correct the verbiage by using a jurat stamp containing the correct wording or attaching a separate jurat form such as this one which does contain proper wording. In addition, the notary must require at oath or affirmation from the document signer regarding the truthfulness of the contents of the deciment. The document must be signed AFTER the oath or affirmation. If the document was previously signed, it must be re-signed in front of the notary public during the jurat process.

- State and County information must be the State and County where the document signer(s) personally appeared before the notaly public.
- Date of notarization must be the tlate that the signer(s) personally appeared which must also be the same date the Jurat process is completed.
- Print the name(s) of document signer(s) who personally appear at the time of notarization.
- Signature of the notary public must match the signature on file with the office of the county clerk.
- The notary seel impression must be clear and photographically reproducible. Impression must not cover text or lines. If seal impression smudges, re-seal if a sufficient area permits, otherwise complete a different jurat form.
 - Additional information is not required but could help to ensure this jurat is not misused or attached to a different document.
- Indicate title or type of attached document, number of pages and date.
- Securely attach this document to the signed document

2008 Version CAPA v1.9.07 800-873-9865 www.NotaryClasses.com